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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939

WAYMO'S PROPOSED VERDICT FORM

VERDICT FORM

QUESTION NO. 1:

Did Waymo show by a preponderance of the evidence that Uber, Ottomotto, and/or Otto Trucking misappropriated Waymo's trade secrets under California law and/or Federal law?

Circle YES or NO as to each Defendant.

Uber – California Law: YES NO

Uber – Federal Law: YES NO

Ottomotto – California Law: YES NO

Ottomotto – Federal Law: YES NO

Otto Trucking – California Law: YES NO

Otto Trucking – Federal Law: YES NO

QUESTION NO. 2:

If you found that Uber, Ottomotto, and/or Otto Trucking misappropriated Waymo's trade secrets, what amount of damages is Waymo entitled to as a result of the trade secret misappropriation?

Unjust Enrichment:

Reasonable Royalty:

1 QUESTION NO. 3:

2 If you found that Uber, Ottomotto, and/or Otto Trucking misappropriated Waymo's trade secrets,
3 do you find that the misappropriation was willful and malicious?

4 Circle YES or NO.

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6 Uber: YES NO

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9 OttoMoto: YES NO

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11 Otto Trucking: YES NO

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2 QUESTION NO. 4:

3 If you found that Uber, Ottomotto, and/or Otto Trucking misappropriated Waymo's trade secrets
4 and that the conduct was willful and malicious, what amount of exemplary damages is Waymo
5 entitled to?
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